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CUSTOMS BROKERS/FREIGHT FORWARDERS/NVOCC FMC # 001214NF

BEFORE THE  
FEDERAL MARITIME COMMISSION

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DOCKET NO. 13-05

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AMENDMENTS TO REGULATIONS GOVERNING OCEAN TRANSPORTATION  
INTERMEDIARY LICENSING AND FINANCIAL RESPONSIBILITY  
REQUIREMENTS AND GENERAL DUTIES

COMMENTS OF KEVIN EGAN

I am Kevin Egan, President of E. Besler & Co.

E. Besler & Co. is Freight Forwarder NVOCC in Chicago, IL. FMC #001214NF

We are a member of the NCBFAA and a member of the NCBFAA's Transportation Committee and are

familiar with the issues raised by the ANPRM and, if this is the case are very concerned about the issues raised by the ANPRM.

We fully support the comments presented by the NCBFAA and specifically oppose:

- Re-application, new fees, new reporting and renewal of FMC licenses every two years.
- Increased bond amounts for FMC bonds from \$50,000 to \$75,000 for ocean freight forwarders, from \$75,000 to \$100,000 for NVOCCs and from \$150,000 to \$200,000 for foreign registered NVOCCs.
- Reduced bond amounts and a special license for those involved strictly in small package household goods barrel trade, when the actions of these parties are those that result in the most complaints received by the FMC and were the focus of FMC Fact Finding Investigation No. 27, Unlawful, Unfair or Deceptive Ocean Transportation Practices Related to the Movement of Household Goods of Personal Property in U.S. – Foreign Oceanborne Trades.
- Institution of a priority system for paying claims made against bonds which would leave OTI last in line for claims against bonds.
- Regulations requiring that any shipping documentation or advertising by agents bear the name and license number of the principal OTI.

Specific questions of the ANPRM

Total revenue for 2012: \$56,000,000.00

FMC Bond Cost: TBD - Have not inquired yet, certainly more

Staff hours required to comply:8

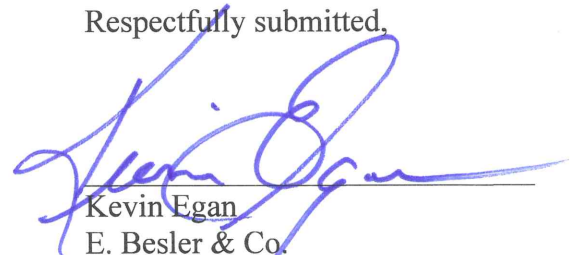
Staff hours with changes: At minimum double

Increase in bond premiums: TBD

Coverage change: Most likely

Estimated cost of compliance: Again TBD but certainly more

Respectfully submitted,



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